

**RECEIVED**  
**MAY 11 2022**  
 UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF MISSISSIPPI

# UNITED STATES DISTRICT COURT

for the

Northern District of Mississippi



Division

SANDRA D. LONDON

Case No. 3:22cv80-MPM-JMV

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☒ Yes ☐ No

AMAZON LLC. MEM#1 AND MEM#3  
 HR DEPT, GENERAL AND ASSISTANT MANAGERS,  
 AREA & OPERATION MANAGERS LISTED

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR EMPLOYMENT DISCRIMINATION

### I. The Parties to This Complaint

#### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	SANDRA D. LONDON
Street Address	7320 HIGHWAY 161N. 19A
City and County	WALLS DESOTO
State and Zip Code	MISSISSIPPI 38680
Telephone Number	(901) 2546241
E-mail Address	User411858@aol.com

#### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	AMAZON MEME#3 HUMAN RESOURCE DEPARTMENT
Job or Title <i>(if known)</i>	MEM#3 HUMAN RESOURCES
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

## Defendant No. 2

Name	MICHAEL DEFILIPPO
Job or Title <i>(if known)</i>	MEM#3 GENERAL MANAGER
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	VINCE NIEMIEC NIEMIEC
Job or Title <i>(if known)</i>	AREA MANAGER MEM#1
Street Address	3292 E, HOLMES ROAD
City and County	MEMPHIS SHELBY
State and Zip Code	TENNESSEE 38118
Telephone Number	662 874-0214
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	KAYLA OWENS
Job or Title <i>(if known)</i>	AREA MANAGER
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

Defendant No. 5

Name	AUGUSTO AREVALO
Job or Title <i>(if known)</i>	AREA MANAGER MEM#3
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

Defendant No. 6

Name	KAREEN WILLIAMS
Job or Title <i>(if known)</i>	MEM#3 AREA MANAGER
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

Defendant No. 7

Name	RAQUEL WOODS
Job or Title <i>(if known)</i>	AREA MANAGER MEM#1
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662 874-0214
E-mail Address <i>(if known)</i>	

Defendant No. 8

Name	KELSEY DANNER LOUDERMILK
Job or Title <i>(if known)</i>	AREA MANAGER
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

Defendant No. **9**

Name	DERRICK BANKS
Job or Title <i>(if known)</i>	AREA MANAGER MEM#3
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

Defendant No. **10**

Name	YERVA HULLETT
Job or Title <i>(if known)</i>	MEM#3 AREA MANAGER
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	

Defendant No. **11**

Name	CEDRIC ESTES
Job or Title <i>(if known)</i>	AREA MANAGER MEM#1
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662 874-0214
E-mail Address <i>(if known)</i>	

Defendant No. **12**

Name	LASHUN CALVIN
Job or Title <i>(if known)</i>	AREA MANAGER
Street Address	1615 COMMERCE PKWY
City and County	HORN LAKE DESOTO
State and Zip Code	MISSISSIPPI 38637
Telephone Number	662-874-0214
E-mail Address <i>(if known)</i>	



**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is

Name	AMAZON LLC. MEM#1 & MEM#3
Street Address	3292 E. HOLMES AND 1615 COMMERCE PKWY
City and County	MEMPHIS, TN SHELBY & HORN LAKE DESOTO
State and Zip Code	TENNESSEE 38118 & MISSISSIPPI 38637
Telephone Number	(662) 874-0214

**II. Basis for Jurisdiction**

This action is brought for discrimination in employment pursuant to *(check all that apply)*:



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*



Other federal law *(specify the federal law)*:



Relevant state law *(specify, if known)*:



Relevant city or county law *(specify, if known)*:

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☒ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts *(specify)*: \_\_\_\_\_

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

(\*\*HIRE DATE SEPT 2019) - Y2021 MONTHS OF APRIL-DEC 2021; SEE ATTACHED TIMELINE DATES

C. I believe that defendant(s) *(check one)*:

- ☐ is/are still committing these acts against me.
- ☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☒ race \_\_\_\_\_
- ☒ color \_\_\_\_\_
- ☒ gender/sex \_\_\_\_\_
- ☐ religion \_\_\_\_\_
- ☒ national origin \_\_\_\_\_
- ☒ age *(year of birth)* 1961 *(only when asserting a claim of age discrimination.)*
- ☐ disability or perceived disability *(specify disability)* \_\_\_\_\_

E. The facts of my case are as follows. Attach additional pages if needed.

## Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Male Area Manager advised me that I needed to be at home, I was too old to work at MEM3. My birthday was recently identified 11/20/2022 prizes given which revealed how old I was. A F/W less qualified and not assigned to my work department was trained by my supervisor. I was skipped/discriminated against and picked over my supervisor. Trained F/W from another department for a position in my department. I was more qualified in terms of job experience, time on the job, education and work in the Quality department was the department. I contacted Amazon Headquarters and filed a complaint, as a result Headquarters found evidence of conduct described in the complaint against one of the managers. As a result the management team retaliated against me with false claims and write up of 90 day final. I voluntarily resigned on Jan 3, 2022. See All Attachments #MEMO Attached.

*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

**IV. Exhaustion of Federal Administrative Remedies**

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

- B. The Equal Employment Opportunity Commission *(check one)*:

☐

has not issued a Notice of Right to Sue letter.

☐

issued a Notice of Right to Sue letter, which I received on *(date)* \_\_\_\_\_.

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☒

60 days or more have elapsed.

☐

less than 60 days have elapsed.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.



Hired and placed in the lowest level of management (PA) despite considering my education (MBA) and job experience. Example of Proof: Female White less qualified and not assigned to my area was promoted and trained by my immediate supervisor. Skipped over and not considered in terms of job experience, time on the job in the Quality Department. Contacted Headquarters to address the issue and retaliation, investigation found evidence on one of the complaints I filed evidence of conduct violation. The retaliation continued until I resigned on Jan 3, 2021 after being placed on suspension. The listed Amazon Defendants committed and participated in acts to intimidate, retaliate, failure to promote me, and used my age as a source to discriminate and cause a stressful workplace, depression, and a unhealthy work/life conditions of my employment. \*\*See Attachments

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/10/2022

Signature of Plaintiff

Printed Name of Plaintiff

  
SANDRA D. LONDON

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address